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JASON EDWARD THOMAS CARDIFF

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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
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13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 vs.

16 JASON EDWARD THOMAS
17 CARDIFF,

18 Defendant.
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Case No. 5:23-cr-00021-JGB

**DECLARATION OF STEPHEN G.
LARSON IN SUPPORT OF
MOTION TO WITHDRAW AS
COUNSEL FOR DEFENDANT
JASON CARDIFF**

*[Filed concurrently with Motion to
Withdraw and [Proposed] Order]*

DECLARATION OF STEPHEN G. LARSON

I, Stephen G. Larson, declare as follows:

1. I am a partner with Larson LLP, and my firm represents Jason Cardiff (“Cardiff”) in this matter. I make this declaration in support of Larson LLP’s Motion to Withdraw as counsel for Cardiff.

2. On January 31, 2023, an Indictment was filed in the instant matter. (ECF No. 1). The Indictment was unsealed on November 27, 2023. (ECF Nos. 7, 11). Shortly thereafter, Cardiff entered into an engagement agreement with Larson LLP to represent him in this matter.

3. Beginning in late December 2023, the Government began producing a considerable amount of documents in discovery. To date, the government has produced over 9.2 million documents, consisting of over 21 million pages.

4. On April 8, 2024, Cardiff filed a Motion to Dismiss the Indictment. (ECF No. 45). This motion was a significant undertaking by Counsel. Specifically, it required Counsel to review and analyze thousands of documents produced by the Government, conduct extensive legal research, draft a comprehensive oversized motion and reply brief, and prepare for oral argument.

5. Since the denial of the Motion in June 2024, Counsel has repeatedly advised Cardiff, including as recently as July 16, 2024, that he is in material breach of the engagement agreement, and that Counsel would file a motion seeking leave to withdraw if Cardiff failed to meet his obligations under the contract. Nevertheless, as of this filing, Cardiff has failed to cure his default under the engagement agreement. Accordingly, at this juncture, there has been an irreconcilable breakdown in the attorney-client relationship which makes continuing representation unreasonably difficult.

6. Counsel provided notice to the Government of their intent to move to withdraw on July 15, 2024.

Executed on this 17th day of July, 2024, at Los Angeles, California.

/s/ Stephen G. Larson
Stephen G. Larson